



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

FILED

2021 SEP 20 PM 2:11

U.S. MAGISTRATE JUDGE

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada
Nevada Bar # 14853
BIANCA R. PUCCI
RACHEL KENT
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Bianca.Pucci@usdoj.gov
Rachel.Kent@usdoj.gov
Attorneys for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN GLEN BURNETT,

Defendant.

Case No. **2:21-MJ-00777-VCF**

Application to Seal

(Under Seal)

The United States of America, by and through Christopher Chiou, Acting United States Attorney, and Bianca R. Pucci and Rachel Kent, Assistant United States Attorneys, respectfully move this Honorable Court for an Order sealing the Complaint, Probable Cause Affidavit, Arrest Warrant, AO257, this Application, and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

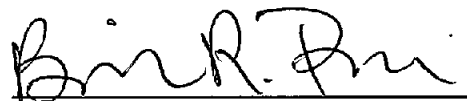
Pursuant to LR IA 10-5, the Government requests that the accompanying Complaint in this case be filed under seal. *See generally*, Fed. R. Crim. P. 6(e)(4) (permitting for the sealing of an indictment); *State of Arizona v. Maypenny*, 672 F.2d 761, 765 (9th Cir. 1982) (supporting the sealing of a search warrant when there is reasonable cause to believe that providing immediate

1 notification may have adverse results); *Matter of Sealed Affidavit(s) to Search Warrants*, 600 F.2d
2 1256 (9th Cir. 1979) (same); *In re Braughton*, 520 F.2d 765, 766 (9th Cir. 1975) (same).
3 In this case, such an order would be appropriate because the Complaint and Affidavit relate to
4 an ongoing criminal investigation into violation(s) of 18 U.S.C. §§ 1591(a) and (b)(2) and 1594(a),
5 that is neither public nor known to all of the targets of the investigation and its disclosure may
6 alert the targets to the ongoing investigation and pending arrest warrant. Public disclosure of the
7 information in the Complaint might possibly jeopardize the investigation because Defendant
8 John Glen Burnett is not yet in custody. Although Burnett is generally aware of the investigation
9 and has spoken with investigators, he is unaware federal charges are being sought against him.
10 If he were to learn of the charges via an unsealed Complaint, he may take evasive measures or
11 destroy potential evidence, or both. Defendant Burnett's knowledge that an arrest warrant has
12 been issued against him may also increase risks to law enforcement in apprehending him.
13 Accordingly, there is reason to believe that disclosure of the information will jeopardize the
14 investigation, including by giving Burnett an opportunity to flee, destroy or tamper with evidence,
15 change patterns of behavior, or notify confederates.

16 DATED this 20th day of September, 2021.

17 Respectfully submitted,

18 CHRISTOPHER CHIOU
19 Acting United States Attorney

20 
21 BIANCA R. PUCCI
22 RACHEL KENT
23 Assistant United States Attorneys
24

FILED
2021 SEP 20 10:13 AM
CLERK OF DISTRICT COURT
DISTRICT OF NEVADA

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JOHN GLEN BURNETT,

7 Defendant.

Case No. 2:21-MJ-00777-VCF

Order to Seal

(Under Seal)

8 Based on the pending Application of the Government, and good cause appearing
9 therefore, **IT IS HEREBY ORDERED** that the Complaint, the Probable Cause Affidavit, Arrest
10 Warrant, AO257, the Government's Application, and this Court's Sealing Order, in the above-
captioned matter shall be sealed until further Order of the Court.

11 IT IS FURTHER ORDERED THAT the Clerk's Office for the United States District
12 Court for the District of Nevada must release the sealed complaint to the CJA Panel Resource
13 Attorney, who may use the information in the sealed complaint for the sole purpose of securing
14 defense counsel in a timely manner.

15 IT IS FURTHER ORDERED THAT, on the day of the arrest of the first defendant in
16 this case, the CJA Resource Attorney may provide defense counsel a copy of the sealed
17 complaint.

18 DATED this 20th day of September, 2021.

19
20 
21 HONORABLE CAM FERENBACH
22 UNITED STATES MAGISTRATE JUDGE
23
24